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Via ECF and Hand Delivery

March 11, 2022

Hon. Colleen McMahon
Senior United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2550
New York, New York 10007

Re: *Pearlstein v. Blackberry Limited*, No. 1:13-cv-7060 (CM) (KHP) (S.D.N.Y.)

Dear Judge McMahon:

We write in response to Your Honor's Memorandum to Trial Counsel dated March 9, 2022 (ECF No. 724) in which Your Honor indicated that "As to . . . Defendants' Motions [in *limine*] No. 22 and 23—until Defendants identify each and every bit of designated deposition testimony that falls within the parameters of Motion No. 22, or each and every individual document that they seek to preclude pursuant to Motion No. 23, I cannot possibly make any sort of ruling." (ECF No. 724 at 1.)

Defendants are prepared to provide the requested detail at the final pretrial conference commencing on Monday, March 14, 2022. Alternatively, Defendants can provide the requested detail in advance of the pretrial conference to both the Court and Plaintiffs' counsel, if more convenient for the Court.

Respectfully submitted,

/s/ James J. Beha II

James J. Beha II

cc: All counsel of record (by ECF)